

EXHIBIT D-4

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

2013 OCT 29 P 3:37

- - - - - X

UNITED STATES OF AMERICA

:

CRIMINAL NO.

3:13CR200 AWT

:

VIOLATION:

- v. -

:

18 U.S.C. § 1343

COÖPERATIEVE CENTRALE

RAIFFEISEN-BOERENLEENBANK B.A.,

:

Defendant,

:

- - - - - X

INFORMATION

The United States Department of Justice, Criminal Division, Fraud Section, and Antitrust Division, charges that at all times material to this Information:

COUNT ONE
(Wire Fraud)

1. Between approximately 2005 and at least 2010, Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A., the defendant, through its employees, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds


for the purpose of executing such scheme and artifice, to wit, the defendant, through its employees, engaged in a scheme to defraud counterparties to interest rate derivatives trades executed on its behalf by secretly manipulating benchmark interest rates to which the profitability of those trades was tied, and in furtherance of that scheme, on or about April 17, 2008, the defendant transmitted or caused the transmission of electronic communications - specifically, (1) an electronic chat between a derivatives trader and a money market trader, (2) a subsequent Yen LIBOR submission from the defendant to Thomson Reuters, and (3) a subsequent publication of a Yen LIBOR rate - through international and interstate wires.

In violation of Title 18, United States Code, Section 1343.

UNITED STATES OF AMERICA

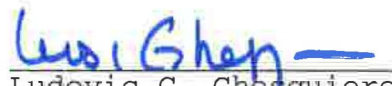
JEFFREY H. KNOX
Chief, Fraud Section
Criminal Division
U.S. Department of Justice

By:


Glenn S. Leon
Assistant Chief
Alexander H. Berlin
Trial Attorney

MARC SIEGEL
Chief, New York Office
Antitrust Division
U.S. Department of Justice

By:


Ludovic C. Ghesquiere
Michael T. Koenig
Trial Attorneys